

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA)
) **CASE NO.: 1:20-CR-00126-LMM-JSA**
VS.)
)
)
THOMAS ADDAQUAY)

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE PRETRIAL
MOTIONS AND TO CONTINUE PRETRIAL CONFERENCE**

Comes Now, THOMAS ADDAQUAY, by and through undersigned
counsel, and submits this Unopposed Motion to Extend Deadline to File Pretrial
Motions and Continue Pre-Trial Conference. In support of this motion, the
Defendant would show as follows:

1.

The Defendant was arraigned in this matter on May 5, 2020. Undersigned Counsel entered into this matter as attorney of record on May 25, 2020.

2.

Discovery was provided on June 10, 2020. The discovery is voluminous and approximately 1TB of information. Although diligent in the review of discovery in this matter, undersigned counsel has not yet completed an initial review of the

discovery. Counsel is not prepared to move forward with the filing of motions in this matter or a pre-trial conference.

3.

Undersigned counsel would request this Court extend the deadline to file motions and continue any pre-trial conference for sixty (60) days.

4.

Undersigned counsel has conferred with AUSA Sneed and she has no objection to extending the time to file motions in this matter.

WHEREFORE, Defendant prays this Court grant the Defendant's request for additional time.

Respectfully submitted this 14th day of August, 2020.

/s/ Rodney Williams
Rodney Williams
Lead Counsel for Defendant
State Bar No.: 765415

Law Office of Rodney Williams, LLC
315 W. Ponce De Leon
Suite 915
Decatur, Georgia 30030
notguilty@attyrodneywilliams.com

/s/Robert Daniel

Robert Daniel

Co-Counsel for Defendant

State Bar No. 204404

Law Offices of Robert Daniel, LLC
Peachtree Center-International Tower
229 Peachtree Street, N.E., Suite 1008
Atlanta, Georgia 30303
Robdaniel@RobertDaniellaw.com

Local Rule 7.1D Certificate

The undersigned hereby certifies that the foregoing has been formatted in Times Roman font, 14 point type, which complies with the font size and point requirements of Local Rule 5.1C.

CERTIFICATE OF SERVICE

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

Respectfully submitted this 14th day of August, 2020.

/s/ Rodney Williams
Rodney Williams
Lead Counsel for Defendant
State Bar No.: 765415

Law Office of Rodney Williams, LLC
315 W. Ponce De Leon
Suite 915
Decatur, Georgia 30030
notguilty@attYRODNEYwilliams.com

/s/Robert Daniel
Robert Daniel
Co-Counsel for Defendant
State Bar No. 204404

Law Offices of Robert Daniel, LLC
Peachtree Center-International Tower
229 Peachtree Street, N.E., Suite 1008
Atlanta, Georgia 30303
Robdaniel@RobertDaniellaw.com